

EXHIBIT 12

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*City of Cleveland, et al. v. Purdue Pharma
L.P.*, Case No. 18-OP-45132;
*County of Cuyahoga, et al. v. Purdue Pharma
L.P., et al.*, Case No. 17-OP-45004;
*County of Summit, et al. v. Purdue Pharma,
L.P. et al.*, Case No. 18-op-45090.

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

DECLARATION OF VIKRAM MASSON

1. My name is Vikram Masson. I am the Global Director of Litigation Consulting at UnitedLex.

2. I am assisting Janssen Pharmaceuticals, Inc. and Johnson & Johnson (together, “Janssen”) and their outside counsel O’Melveny & Myers LLP in the above-captioned MDL. UnitedLex serves as Janssen’s document review vendor in this matter.

3. UnitedLex has also assisted in the collection of several sources of documents related to Duragesic and Nucynta for this matter and works with Janssen on various other litigation matters for document collection and review purposes.

4. I submit this declaration in support of the Memorandum of Law in Support of the Manufacturer Defendants’ Joint Objection to Discovery Rulings Nos. 2 and 3.

Status of Janssen’s Discovery Efforts

5. Janssen has produced over 535,000 documents in this matter, totaling more than 2.98 million pages. These documents were collected from the originally identified 49 custodians

and 35 non-custodian sources. Janssen substantially completed its productions of these original sources on July 20, 2018.

6. Janssen plans to produce additional materials from 28 newly-added custodians in the first week of August.

Expansion of Product and Temporal Scope

7. I understand that the Court has ordered production of documents related to an additional Janssen opioid product, Tylox, and extended the scope of discovery for Janssen's Duragesic product back to January 1, 1995. Janssen is still investigating where potentially responsive documents for Duragesic, dating back to 1995, are located.

8. For Duragesic, Janssen has determined that there are over 3,300 archived boxes that could contain potentially responsive materials to respond to Plaintiffs' discovery requests.

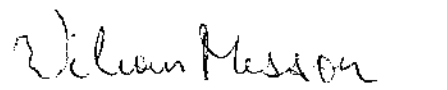
9. For Tylox, Janssen has determined that there could be anywhere from 1,300 to 3,500 archived boxes that could contain potentially responsive materials to respond to Plaintiffs' discovery requests.

10. Once O'Melveny and UnitedLex conduct an initial review of indices related to these boxes, the boxes must be recalled from offsite storage and transferred to a Janssen location for potential relevancy review. Any content that is flagged as potentially relevant will be designated for scanning. A scanning vendor will then retrieve the potentially relevant content and transfer it to their facilities for scanning and processing into electronic format. The scanning vendor will then deliver the electronic data to Janssen's eDiscovery processing vendor. Janssen's eDiscovery processing vendor will then load these materials to a review database where UnitedLex will review for responsiveness. Once documents have been designated as responsive, Janssen's eDiscovery processing vendor will then prepare these documents for production.

11. Given that there could be over 6,000 boxes of potentially responsive documents, which are archived in hardcopy format, located in offsite storage, and date back to 1995, Janssen cannot, with any reasonable certainty, confirm that it will complete the document collection, processing, and review of these documents by the fact discovery deadline of August 31, 2018.

12. I declare under penalty of perjury that the statements in this declaration are true to the best of my knowledge and belief.

Dated July 24, 2018

A handwritten signature in black ink, reading "Vikram Masson", written over a horizontal line.

Vikram Masson